

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11340 DPW

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U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STEPHEN KEEFE,
Plaintiff

v.

LOCAL 805, INTERNATIONAL
LONGSHOREMEN'S ASSOCIATION, AFL-CIO,
LOCAL 800, INTERNATIONAL
LONGSHOREMEN'S ASSOCIATION, AFL-CIO,
and LOCAL 799, INTERNATIONAL
LONGSHOREMEN'S ASSOCIATION, AFL-CIO,
Defendants

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JOINT PRETRIAL STATEMENT

The parties in the above-captioned matter hereby submit their Joint Pretrial Statement in connection with the scheduling conference.

I. Agenda for Discussion

- A. Discovery Schedule
- B. Dispositive Motion Schedule.

II. Joint Discovery Plan

The parties have agreed to the following discovery schedule:

- A. Automatic disclosures completed by January 15, 2005;

B. All discovery completed by July 15, 2005.

III. Schedule for Filing of Dispositive Motions

A. Rule 56 motion served and filed by August 15, 2005;

B. Opposition to Rule 56 motion served and filed by September 15, 2005.

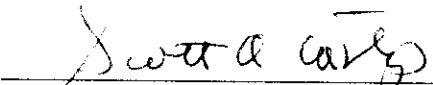
IV. Possible Trial By Magistrate Judge

The parties do not consent to trial by a Magistrate Judge.

V. Certification Pursuant to Local Rule 16.1(D)(3)

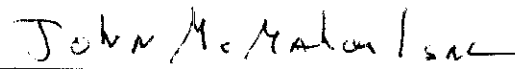
The parties will submit certifications in compliance with Local Rule 16.1(D)(3)

FOR PLAINTIFF:

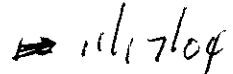


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Dated:  11/17/04